

**UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF WISCONSIN**

In Re:

In Bankruptcy No:

JENNIFER MCKINNEY

Debtor.

Case No: 22-10661(Chapter 13)

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

Jennifer McKinney, debtor by her attorneys, PITTMAN & PITTMAN LAW OFFICES, LLC by Greg P. Pittman, hereby objects to the Motion to Dismiss the Chapter 13 case as the Debtor has continued to make monthly payments. If she is eligible for a chapter 13, a modified chapter 13 plan will be filed to cure any default.

Dated this 31st day of August, 2022 at La Crosse, Wisconsin.

PITTMAN & PITTMAN LAW OFFICES, LLC.

By: s/Greg P. Pittman
Greg P. Pittman
Attorney for Debtor
Attorney No. 1073787
712 Main Street
La Crosse, WI 54601
(608) 784-0841

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**ORDER EXTENDING TIME TO FILE CHAPTER 13 SUMMARY OF ASSETS AND LIABILITIES,
STATEMENT OF FINANCIAL AFFAIRS, STATEMENT OF CURRENT MONTHLY INCOME,
EMPLOYEE INCOME RECORDS, SCHEDULES A/B, C, D, E, F, G, H, I, J AND CAPTER 13 PLAN
UP AND THROUGH NOVEMER 24, 2021**

The above named matter having come on pursuant to a Motion to Extend Time to file Chapter 13 Summary of Assets and Liabilities, Statement of Financial Affairs, Statement of Current Monthly Income, Employee Income Records, Schedules A/B, C, D, E, F, G, H, I, J and Chapter 13 Plan up and through May 20, 2022 and the Debtor is requesting this extension as the original petition was filed as an emergency.

IT IS ORDERED AS FOLLOWS:

1. The Debtor shall file the Summary of Assets and Liabilities, Statement of Financial Affairs, Statement of Current Monthly Income, Employee Income Records, Schedules A/B, C, D, E, F, G, H, I, J and Chapter 13 Plan on or before May 20, 2022.

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